

IN THE UNITED STATE DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

HACIENDA RECORDS, L.P.

§

Plaintiff,

§

v.

§ NO: 2:14-cv-00019

RUBEN RAMOS, et al.

§

Defendants.

§

JURY DEMAND

**HACIENDA'S MOTION FOR LEAVE TO FILE A SUPPLEMENT TO ITS
APPLICATION FOR ATTORNEYS' FEES AND COSTS**

TO THE HONORABLE COURT:

Hacienda Records, L.P., Hacienda Records and Recording Studio, Inc., Latin American Entertainment, L.L.C., Richard Garcia, aka Rick Garcia, and Roland Garcia, Sr., deceased (“Hacienda”), seek leave of Court to file a supplement to their Application for Attorneys’ Fees and Costs as follows:

I. REQUEST FOR LEAVE

1. Hacienda previously has requested the Court to award attorney’s fees, costs and equitable relief. *See* Docs. 222, 237. Since the filing of Hacienda’s Reply on December 23, 2016, *see* Doc. 237, there has been new case law reported on the issues raised, additional filings by Claimants in the Fifth Circuit Court of Appeals, and additional fees incurred by Hacienda in the District Court. Accordingly, good cause exists for Hacienda to file a short supplement of not more than ten (10) pages.

2. An invoice for legal services performed in January 2016 has not yet been prepared and sent to Hacienda. Although Hacienda has and will continue to incur additional fees and costs in connection with work in the District Court, in an effort to reduce the filings in this case, and assuming no additional filings by Claimants in the District Court, Hacienda represents

that it will not seek any fees or costs for the preparing and filing of this Motion for Leave, and if granted, for the preparing and filing of the supplement, nor for the additional work performed in the District Court in January 2017 and which may be performed thereafter in the District Court, which has not yet been invoiced to Hacienda. The evidence for services for the appeal has already been submitted and will not be revised as well.

3. Hacienda requests leave to file a short supplement of no more than ten (10) pages within five (5) business days of the entry of the Court's Order, in substantially the same form as attached. *See Exhibit A.*

4. This Motion is not filed for delay, but so that justice may be served.

II. CERTIFICATE OF CONFERENCE

5. Counsel for Hacienda has asked counsel for Claimants if this Motion is opposed, and counsel for Claimants is opposed.

III. CONCLUSION

6. This Motion is not filed for delay, but so that justice may be served, and Hacienda respectfully asks for leave to file a short supplement to its application for attorneys' fees and costs of no more than ten (10) pages within five (5) business days of the entry of the Court's Order on this Motion, and for such other relief as the Hacienda parties are justly entitled.

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Roland Garcia

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ATTORNEYS FOR HACIENDA
RECORDS, L.P., HACIENDA RECORDS
AND RECORDING STUDIO, INC.,
LATIN AMERICAN ENTERTAINMENT,
L.L.C., RICHARD GARCIA, aka RICK
GARCIA, and ROLAND GARCIA, SR.,
Deceased

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served through the Court's ECF system to all counsel of record on February 3, 2017.

/Roland Garcia/
Roland Garcia

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DECLARATION OF ROLAND GARCIA

1. My name is Roland Garcia. I am over the age of 21, of sound mind and competent to make this Declaration and have the legal capacity to make this Declaration. I am an attorney licensed to practice law in the State of Texas. I am a shareholder at the law firm of Greenberg Traurig, LLP. I am one of the attorneys representing Hacienda Records et al. in this matter. I have personal knowledge of the statements contained in this Declaration, which are true and correct.

2. The statements contained in Hacienda's Motion for Leave to File a Supplement to its Application for Attorney's Fees and Costs (the "Motion") are true and correct and within my personal knowledge. Attached is a true and correct copy of the Exhibit A referenced in the Motion.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Roland Garcia

Roland Garcia

The Declaration was executed on February 3, 2017.